

# **EXHIBIT 4**

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January 30, 2023

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Re: *Brown, et al. v. Google LLC*, Case No. 4:20-cv-03664-YGR-SVK (N.D. Cal.); *Calhoun, et al. v. Google LLC*, Case No. 4:20-cv-05146-YGR-SVK (N.D. Cal.)

Dear Counsel:

We write (i) in furtherance of our meet and confer on January 27, 2023, where Google demonstrated for Plaintiffs how the information in the tables that are the subject of Google's Motion for Relief in both *Brown* (Dkt. 782) and *Calhoun* (Dkt. 898) is contained in or may be derived from other information that Google is separately preserving, and (ii) in response to any unresolved questions raised by Plaintiffs during the meet and confer.

As stated during the meet and confer and in our January 28, 2023 letter, we dispute the relevance of those additional questions to the issue the Court has asked the parties to meet and confer on. Nevertheless, in the spirit of collaboration, we provide answers below.

**I. [REDACTED] Tables**

[REDACTED]. At the meet and confer, Google counsel walked Plaintiffs through the following sampled data, which shows that the [REDACTED] tables contain linkages between Biscotti IDs that have been grouped together under a single [REDACTED] ("[REDACTED]") and are identified

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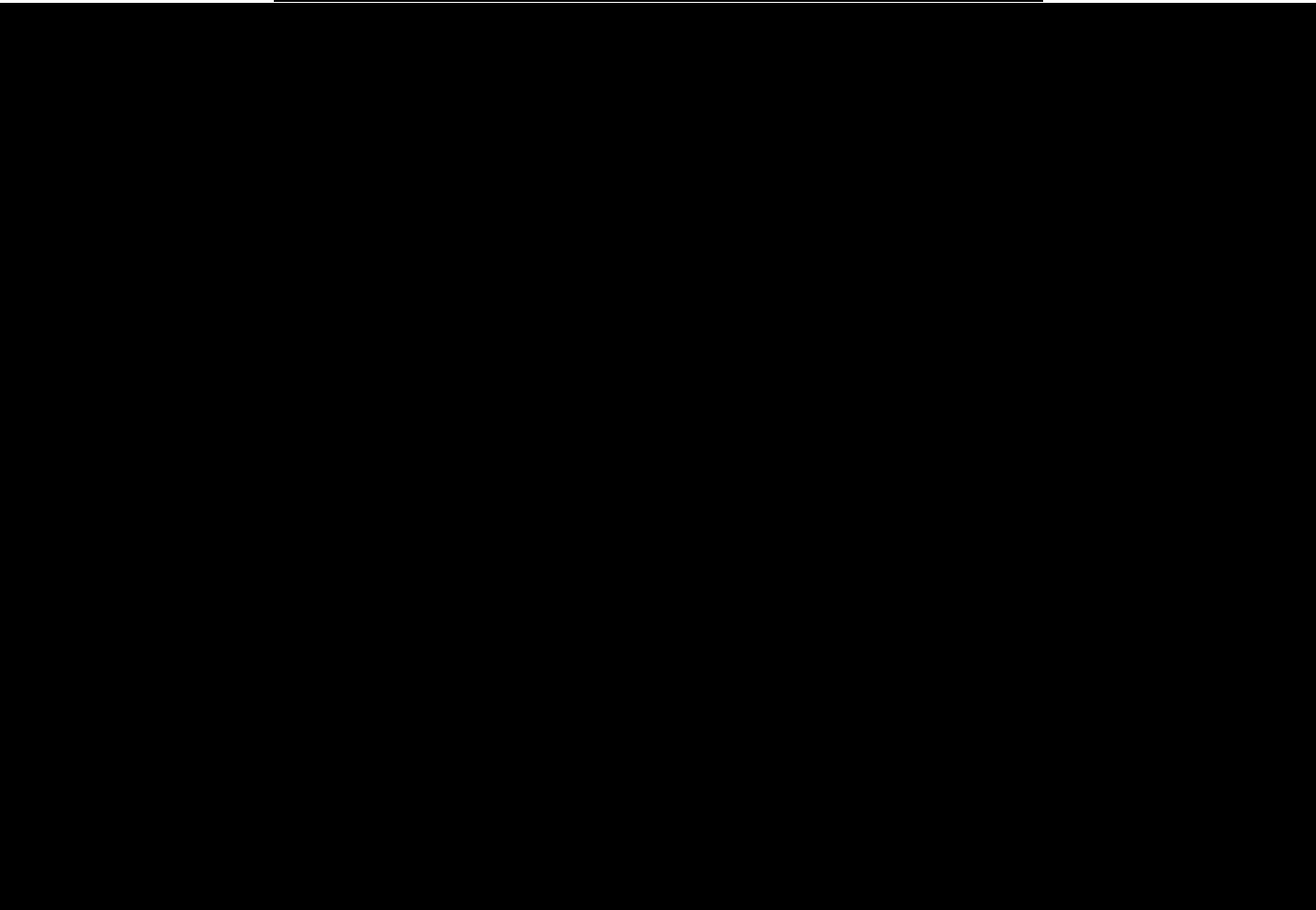
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as possibly belonging to the same user/device. Google counsel also explained that the Biscotti linkages contained in the [REDACTED] tables are derived from the source tables referenced in its January 26, 2023 letter. Plaintiffs inquired as to how the [REDACTED] are generated and whether they are also derived from the source tables.

Google confirms that the "[REDACTED]" is one of the Biscotti IDs grouped together in the [REDACTED] tables as possibly belonging to the same user, and any linkage between the "[REDACTED]" and other Biscotti IDs is derived from the source tables referenced in Google's January 26, 2023 letter. That is because after [REDACTED] groups/links multiple Biscotti IDs as possibly belonging to the same user/device, it defines one of them as the "[REDACTED]"/"[REDACTED]". For instance, the entries highlighted in red below represent the "[REDACTED]"/"[REDACTED]". ("[REDACTED]" is the hexadecimal representation of the decimal number [REDACTED], see <https://www.rapidtables.com/convert/number/hex-to-decimal.html>).

The Biscotti linkages contained in the [REDACTED] tables (including linkages between the "[REDACTED]"/"[REDACTED]" and other Biscotti ID/ "[REDACTED]") are derived from ID mappings/linkages that involve either signed-in data or App activities. No Biscotti ID received as part of the data flow in *Brown* (signed-out Incognito web traffic) is linked in the [REDACTED] tables.

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**Deprecated Data Sources.** In its January 26, 2023 letter, Google included the source code used to define the “██████████” field in the sampled ██████████ data, which represents the source tables from which the Biscotti linkages contained in the ██████████ tables are derived. Plaintiffs inquired about the ████████ data sources marked as “[deprecated = true].” Google confirms that these sources were never launched in the ██████████ pipelines or the use of these sources in ██████████ was deprecated at least ██████████ ago, while ██████████ is configured to keep only the Biscotti linkages generated within the past ██████████ or less.

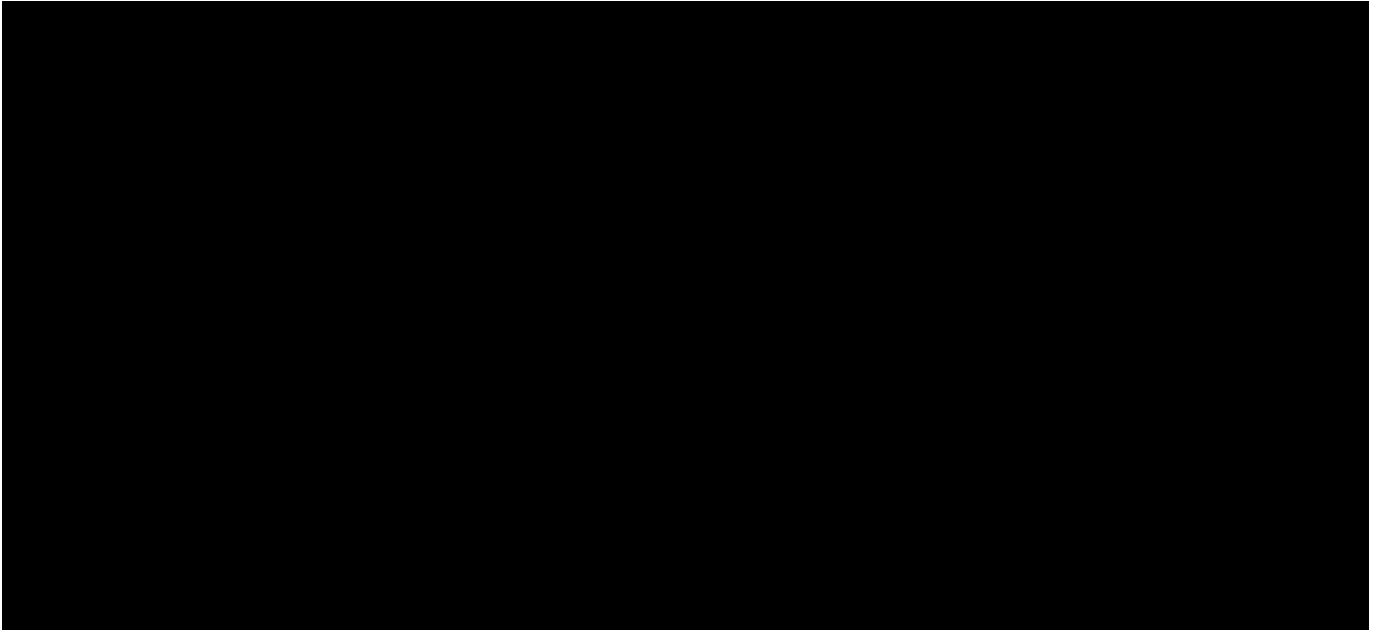
**II. Analytics Tables**

In response to Plaintiffs’ inquiries at the meet and confer, Google confirms that the ████████ Analytics tables do not contain any field that may indicate whether a user is browsing in private browsing mode; nor do they contain any field that may indicate whether Chrome Sync is enabled or disabled, including any field that signals the “██████████.”

Google also confirms that the ████████ Analytics tables do not contain any user or device ID other than CID, UID, Biscotti or device ID.

Plaintiffs also inquired about the “██████████” contained in the sampled mappings entries from the ██████████ table in Google’s January 26, 2023 letter (reproduced below). The field

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Sincerely,

QUINN EMANUEL URQUHART & SULLIVAN, LLP

A handwritten signature in blue ink, appearing to read "V. Trebicka", is written over the printed name.

Viola Trebicka

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